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14 Attorneys for Defendant
JOHNSON CONTROLS, INC.

15 **UNITED STATES DISTRICT COURT**

16 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

17
18 BRANDIE WILLIAMS,

Case No. 2:21-CV-02307-TLN-CKD

19 Plaintiff,

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY AND
DISPOSITIVE MOTION DEADLINE**

20 vs.

[Placer County Superior Court
Case No. S-CV-0047572]

21 JOHNSON CONTROLS, INC., and DOES 1
through 20, inclusive,

Action Filed: November 8, 2021
Removal Filed: December 15, 2021
Trial Date: None Set

22 Defendants.
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25 Plaintiff BRANDIE WILLIAMS (“Plaintiff”) and Defendant JOHNSON CONTROLS, INC.
26 (“Defendant”) (collectively referred to as the “Parties”) through their respective counsel of record,
27 hereby stipulate and ask the Court extend discovery and dispositive motion in accordance with the
28 stipulated scheduled set forth herein and in light of the good cause set forth herein.:
1

1 WHEREAS, the Initial Pretrial Scheduling Order entered on December 15, 2021, set the
2 following deadlines:

3 Discovery Cutoff: August 19, 2022

4 Expert Disclosure: October 18, 2022

5 Dispositive Motion Filing Deadline: February 15, 2023

6 WHEREAS, the Parties exchanged their Initial Disclosures in February 2022 and thereafter
7 promptly and diligently began conducting further written discovery;

8 WHEREAS, in February 2022, Plaintiff propounded written discovery, set one on
9 Defendant and Defendant responded to those requests in April 2022;

10 WHEREAS, in March 2022, Defendant propounded written discovery, set one on Plaintiff
11 and Plaintiff responded to those requests in April 2022;

12 WHEREAS, the parties and met and conferred extensively regarding Defendant's discovery
13 responses, including telephone conferences on May 5, 2022, and July 8, 2022, and email
14 correspondence regarding the same;

15 WHEREAS, Defendant provided supplemental ESI production on June 17, 2022, and is in
16 the process of amending those responses and providing additional supplemental documents to
17 Plaintiff;

18 WHEREAS, in June 2022, Plaintiff propounded written discovery, set two on Defendant
19 and those responses are due August 1, 2022;

20 WHEREAS, the current discovery deadlines will not provide the Parties sufficient time to
21 conduct additional discovery, including necessary depositions and third-party discovery;

22 WHEREAS, the Parties believe that a continuance of all pending dates and deadlines, is in
23 the best interests of the Parties and the Court, as it will conserve all resources and ensure that the
24 Parties are able to complete discovery;

25 WHEREAS, for these reasons, good cause exists to extend both the non-expert and expert
26 discovery deadlines by 120 days; and

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1 WHEREAS, for these same reasons, the Parties believe that all other pretrial dates and
2 deadlines should likewise be extended by at least 120 days to conform the pretrial schedule to the
3 discovery deadlines;

4 NOW THEREFORE, the Parties, by and through their undersigned counsel, do hereby
5 agree and request that the dates and deadlines in the Scheduling Order set forth above be amended
6 as follows:

7 Discovery Cutoff: December 18, 2022

8 Expert Disclosures: February 15, 2023

9 Dispositive Motion Filing Deadline: June 15, 2023

10 **IT IS SO STIPULATED.**

11 DATED: July 22, 2022

RUDY, EXELROD, ZIEFF & LOWE, LLP

13 By: /s/ Michelle G. Lee [as auth. 7.22.22]
14 Michelle G. Lee
Meghan F. Loisel

15 Attorneys for Plaintiff
16 BRANDIE WILLIAMS

17 DATED: July 22, 2022

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

19 By: /s/ April A. Perkins
James T. Conley
April A. Perkins

21 Attorneys for Defendant
JOHNSON CONTROLS, INC.

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ORDER

Good cause appearing, the Court hereby modifies the Scheduling Order to extend discovery deadlines and all other dates in the Scheduling Order for 180 days as follows:

Discovery Cutoff: December 19, 2022

Expert Disclosures: February 15, 2023

Dispositive Motion Filing Deadline: June 15, 2023

IT IS SO ORDERED.

DATED: July 25, 2022

Troy L. Nunley

Troy L. Nunley
United States District Judge